

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION**

<b>JILL HINES ET AL</b>	*	
	*	<b>CASE NO. 3:23-CV-571</b>
	*	
<b>VERSUS</b>	*	<b>CHIEF JUDGE TERRY A. DOUGHTY</b>
	*	
<b>ALEX STAMOS ET AL</b>	*	<b>MAG. JUDGE KAYLA D. MCCLUSKY</b>
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**CONSENT MOTION FOR EXTENSION OF THE PAGE LIMIT FOR  
DEFENDANTS' JOINT MOTION TO DISMISS THE COMPLAINT**

NOW INTO COURT, through undersigned counsel, come Defendants Alex Stamos, Renée DiResta, the Board of Trustees of the Leland Stanford Junior University, the Leland Stanford Junior University, the Stanford Internet Observatory, Kate Starbird, Graphika, Camille François, Atlantic Council, the Atlantic Council's Digital Forensic Research Lab, and Graham Brookie ("Defendants"),<sup>1</sup> who respectfully move, pursuant to L.R. 7.8, for an extension of the page limit of their forthcoming Joint Motion to Dismiss, from 25 pages to 55 pages. Plaintiffs have consented to this request.

In support, Defendants represent as follows:

1. Granting the requested extension will serve judicial economy. Plaintiff has sued four separately represented groups of defendants. If each group of defendants were to file a brief of 25 pages as permitted by L.R. 7.8, their motions would total 100 pages spread over four separate

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<sup>1</sup> The Stanford Internet Observatory is a Stanford program, not an independent legal entity that can sue or be sued, and it has not been properly served and is not a proper defendant. Likewise, the Digital Forensic Research Lab is an Atlantic Council program, not an independent legal entity that can sue or be sued, and it has not been properly served and is not a proper defendant. This issue will be addressed in Defendants' forthcoming Joint Motion to Dismiss.

briefs; an extension of the page limit for a single brief serves the interests of judicial economy by enabling defendants to consolidate their arguments into a single 55-page motion.

2. The proposed extension will allow Defendants to file a brief commensurate with the Complaint. The Complaint is 88 pages and includes 18 exhibits, themselves comprising many hundreds of pages. Plaintiff's suit states four distinct causes of action, involves separately situated Plaintiffs and Defendants, and presents numerous questions of federal, state, and constitutional law. An extension of the page limit is necessary, therefore, for Defendants to address all of Plaintiffs' claims.

3. Counsel for Defendants have conferred with counsel for Plaintiffs, and Plaintiffs consent to this extension of the page limit.

WHEREFORE, Defendants request that the Court grant this motion and enter an order extending the page limit for Defendants' Joint Motion to Dismiss to 55 pages.

August 9, 2023

/s/ Camala E. Capodice

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*Counsel for Kate Starbird*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 9th day of August, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and I further certify that, on the same day, I mailed, faxed, or e-mailed the foregoing document with exhibits and notice of electronic filing to the attorneys for all parties.

s/ Devin C. Reid

Devin C. Reid

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION**

**JILL HINES ET AL**

**VERSUS**

**ALEX STAMOS ET AL**

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**CASE NO. 3:23-CV-571**

**CHIEF JUDGE TERRY A. DOUGHTY**

**MAG. JUDGE KAYLA D. MCCLUSKY**

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**ORDER**

Considering the Consent Motion for Extension of the Page Limit for Defendants’ Joint Motion to Dismiss the Complaint filed by Alex Stamos, Renée DiResta, the Board of Trustees of the Leland Stanford Junior University, the Leland Stanford Junior University, the Stanford Internet Observatory, Kate Starbird, Graphika, Camille François, Atlantic Council, the Atlantic Counsel’s Digital Forensic Research Lab, and Graham Brookie (the “Motion”),

**IT IS HEREBY ORDERED** that the Motion is **GRANTED**.

**IT IS FURTHER ORDERED** that the page limit for Defendants’ Joint Motion to Dismiss is hereby extended to 55 pages.

**SIGNED** this \_\_\_\_ day of \_\_\_\_\_, 2023, in \_\_\_\_\_, Louisiana.

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UNITED STATES DISTRICT JUDGE

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WESTERN DISTRICT OF LOUISIANA  
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**LOCAL RULE 7.9 CERTIFICATE**

Pursuant to Western District of Louisiana Local Rule 7.9, undersigned counsel hereby certifies that he has conferred with counsel for Plaintiffs Jill Hines and Jim Hoft concerning Defendants' Consent Motion for Extension of the Page Limit for Defendants' Joint Motion to Dismiss the Complaint (the "Motion"), and Plaintiffs consent to the extension of the page limit sought by the Motion.

Respectfully submitted,

/s/ James Brown

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 30th day of May, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, and I further certify that, on the same day, I mailed, faxed, or e-mailed the foregoing document with exhibits and notice of electronic filing to the attorneys for all parties.

/s/ Devin C. Reid

Devin C. Reid